

BEFORE THE
POSTAL RATE COMMISSION

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

DOCKET NO. R97-1

FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION OF DOCUMENTS FROM UNITED PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN
(UPS/USPS-T9-1)

(August 18, 1997)

Pursuant to the Commission's Rules of Practice, United Parcel Service hereby serves the following interrogatories and requests for production of documents directed to United States Postal Service witness Tayman (UPS/USPS-T9-1).

Respectfully submitted,



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**INTERROGATORIES OF UNITED STATES PARCEL SERVICE
TO UNITED STATES POSTAL SERVICE WITNESS TAYMAN**

UPS/USPS-T9-1. Please refer to your discussion of "Recovery of Prior Year Losses" on pages 39 to 42 of your Direct Testimony and assume that the Commission were to approve the proposed rates, resulting in a test year Parcel Post cost coverage that the Postal Service estimates to be 103%.

(a) Over the expected effective duration of these rates, what is your estimate of the total dollar contribution that Parcel Post would make to the restoration of the Postal Service's equity?

(b) What would be the total dollar contribution that Parcel Post would make in the test year to the restoration of the Postal Service's equity?

(c) Of the total contributions to the restoration of the Postal Service's equity in the test year, what percentage comes from Parcel Post?

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document in
accordance with section 12 of the Commission's Rules of Practice.


Stephanie Richman

Dated: August 18, 1997
Philadelphia, Pa.